

and the page-limit modifications the Court previously approved for the parties' opening summary-judgment briefs [Dkt. 379], the parties jointly propose the following page limits for opposition and reply briefs:

- In opposition to PPFA and the Affiliate Defendants' motions for summary judgment, the State of Texas and Relator (collectively, "Plaintiffs") may file a joint response of up to 100 pages, or may file two separate responses of no more than 50 pages each, with joinder in the other response;
- In opposition to Plaintiffs' motions for summary judgment, Affiliate Defendants and PPFA may file a joint response of up to 100 pages, or may file two separate responses of no more than 50 pages each, with joinder in the other response;
- If Plaintiffs elect to file a reply in support of their motions for summary judgment, they may file a joint response of up to 50 pages, or may file two separate responses of no more than 25 pages each, with joinder in the other response;
- If PPFA and the Affiliate Defendants elect to file a reply in support of their motions for summary judgment, they may file a joint response of up to 50 pages, or may file two separate responses of no more than 25 pages each, with joinder in the other response.

In addition, because Relator's counsel currently has an oral argument in the Fifth Circuit the week of February 6, and because the Affiliate Defendants' counsel have a preexisting conflict on February 17, the parties respectfully request that the deadline for submitting all reply briefs be moved from February 10, 2023 to **February 21, 2023**.

For the foregoing reasons, the parties respectfully request that the Court adopt the modifications to the page limits and deadlines described herein.

Dated: January 25, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2023, a copy of the foregoing was served pursuant to the Court's ECF system.

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